EXHIBIT 3

PII Redacted Pursuant to Fed. R. Civ. P. 5.2

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

USAMA JAMIL HAMAMA, et al.,

Plaintiffs/Petitioners.

ν.

REBECCA ADDUCCI, et al., Defendants/Respondents.

Case No. 2:17-cv-11910 Hon. Mark A. Goldsmith Mag. David R. Grand

Class Action

DECLARATION OF GHADA ATTIEH

- I, Ghada Attieh, make this declaration based upon my own personal knowledge and if called to testify, I could and would do so competently as follows:
- 1. I am the owner of Beyond Words, an interpretation and translation firm in Washington D.C. I founded the firm in 2005. We specialize in English, French, and Arabic translations.
- 2. I have a certificate in paralegal studies from Georgetown University; a Masters Degree in Linguistics and a Bachelors degree in Translation from Université Laval (Quebec, Canada). I am fluent in English, French, and Arabic, with special expertise in interpretation and translation in legal matters.
- 3. Attached to my declaration are Exhibits A-K. Exhibits A and B each consist of two documents which are blank, apart from the printed text: an English document and an Arabic document. The Arabic documents which are part of Exhibits A and B are nearly identical to the pre-printed Arabic forms attached as Exhibits C-K. The Arabic and English documents in Exhibit A are not the same as each other, and the Arabic and English documents in Exhibit B are not the same as each other
- 4. I was hired by the ACLU to translate several documents in this case—they are attached, with my translations, as Exhibits C-K. They are nearly identical pre-printed forms, in Arabic. They are filled in by hand or have hand-written notes on them. I was asked to translate only the parts that are printed and the dates

(including those that are in handwriting); I did not translate the other handwriting that appears on the documents.

- 5. Below is a list of Exhibits A-K, identifying the records by either the number used on the court docket or the Bates stamp number that appears in the center at the bottom of the page and startes with prefix "ICE."
 - Exhibit A ACLU counsel told me that these documents were provided by Lauren Gilbert and filed with the Court at ECF 307-2, Pg.ID 7330-31. The exhibit consists of both an English and Arabic document.
 - Exhibit B ACLU counsel told me that these documents accompanied the declaration of James Maddox and were filed with the court at ECF 311-3, Pg.ID 7489-90. The exhibit consists of both an English and Arabic document.
 - Exhibit C ICE-0295885; dated 21/3/2016.
 - Exhibit D ICE-0296712; dated 20/6/2016.
 - Exhibit E ICE-0296587; dated 12/30/2016.
 - Exhibit F ICE-0295793; dated [illegible], 2016.
 - Exhibit G ICE-0267486; preprinted date: 2016.
 - Exhibit H ICE-0267496; preprinted date: 2016.
 - Exhibit I ICE-0295669; dated 5/4/2017, with the preprinted year 2016 crossed out and replaced with 2017 (the "6" in "2016" was replaced with a handwritten "7").
 - Exhibit J ICE-0267593; preprinted year 2016 crossed out and "06-8-2017" written by hand.
 - Exhibit K ICE-0296616; dated 04/11/2017, with the preprinted year 2016 crossed out and replaced with 2017 (the "6" in "2016" was replaced with a handwritten "7").
- 6. I had previously translated the Arabic portion of Exhibit A (which is identified as ECF 307-2, Pg.ID 7331). I understand that translation was submitted to the court in this case as ECF 307-3, Pg.ID 7333-36; it is attached to my Declaration as Exhibit A-1. I had not previously seen the English portion of Exhibit A, which is identified as ECF 307-2, Pg.ID 7330. Though both documents have similar language, the English document references a passport rather than a limited-validity passport, omits the phrase "with the knowledge that I don't hold a passport," and adds the sentence "I would like to inform you that I have an old Iraqi passport that is not valid with the number ()."

7. The translation of the Arabic page of Exhibit A (ECF 307-2, Pg.ID 7331) is:

Dear Honorable Consul,

Subject: Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport.

Sincerely,

Signature:

Name of Citizen:

Date:

Address:

Telephone Number:

8. In Exhibit A, the English document is different from the Arabic document. Below is a reproduction of the English document, showing how it differs from the Arabic version (deletions are shown in strike-out, and additions are bolded):

Dear Honorable Consul,

Subject: Limited Validity Passport

I the Iraqi citizen () would like to request the issue of a limited validity passport allowing me to enter Iraq due to my particular situation and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport.

I would like to inform you that I have an old Iraqi passport that is not valid with the number ().

With thanks and appreciation,

The signature:

The name:

The date:

The address:

The telephone number:

9. Exhibit B is identical to Exhibit A, in both the English and Arabic.

- 10. Exhibits C through K are nearly identical to the Arabic documents in Exhibits A and B; the only difference (apart from omission of a salutation) is the addition of the phrase "to return to to [sic] the homeland." Exhibits C through K are identical to each other except that some have a preprinted year (2016) and others do not.
- 11. Exhibits C through K read, in translation with the bolded text showing the language that appears on Exhibits C through K but not in the Arabic versions of Exhibits A and B, and strike-outs for language that appears on Exhibits A and B but not Exhibits C through K:

Dear Honorable Consul,

Subject: Limited-Validity Passport

I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport to return to to [sic] the homeland.

Signature:

Name of Citizen:

Date:

Address:

Telephone number:

12. I hereby certify that the translations just provided are true and accurate versions of the original Arabic documents, and that I am competent in both English and Arabic to render and certify such translations.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge, information, and belief.

Executed this <u>24</u> day of August, 2018, in Washington, DC

Cheola AHieh

Ghada Attieh

EXHIBIT A

Dear Honorab	le Consul,				
Subject: Passpe	ort				
I the Iraqi citize me to enter Iraq to Iraq. I would like to in number (due to my parti	icular situati	on and my d	esire to retu	
	With thanks ar	nd appreciat	ion,		
The signature:					
The name:					
The date:					
The address:					
The telephone num	ber:				
				Left thu	umb fingerpri

السيد القنصل المحترم

م/حواز مرور

انسي المواطن العراقي (وذلك لظروف خاصة ورغبتي بالعودة الطوعية الى العراق, علماً انني لا احمل جواز مغر . مع الشكر والتقديد .

التوقيع:

المواطن:

التاريخ:

العنوان:

رقم الهاتف:

EXHIBIT A-1



CERTIFICATE OF TRANSLATION

We, Beyond Words, LLC, hereby certify that the English document entitled Subject/Limited-Validity Passport, is a true and accurate version of the original Arabic document. We further certify that we are competent in both English and Arabic to render and certify such translation.

Beyond Words, LLC Signature: Ghada Attich
Beyond Words, LLC Printed Name: GHADAATTEH

NOTARY

District of Columbia: SS

Subscribed and Sworn to before me, in my presence, this 6th day of JUNE, 2018

Notary Public, DC

My commission expires on 0.5/14, $20\frac{33}{2}$.

MARALE G. GARABETIAN NOTARY PUBLIC DISTRICT OF COLUMBIA My Commission Expires May 14, 2023





I certify that the foregoing statement of my qualifications and the foregoing translation are true and correct, under penalty of perjury under the laws of the United States.

WASHINGTON, DC

Sworn in {CITY OR COUNTY}, (STATE), on this 6th day of June, 2018.

<u> Guada AMU</u>signatur

Ghada Attieh

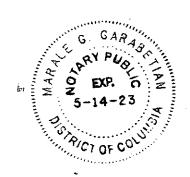
District of Columbia: SS

Subscribed and sworn to before me, in my presence, this 6th day of JUNE, 2018

Marale G. Garabetian, Notary Public, D.C.

My commission expires May 14, 2023.

MARALE G. GARABETIAN NOTARY PUBLIC DISTRICT OF COLUMBIA My Commission Expires May 14, 2023



Dear Honorable Consul,	
	Subject/ Limited-Validity Passport
I, an Iraqi citizen (travel] to Iraq and this is for perso knowledge that I don't hold a pass), would like to request a limited-validity passport issued to me [to nal circumstances and my desire to return voluntarily to Iraq, with the sport.
Sincerely,	
Signature:	
Name of Citizen:	
Date:	
Address:	
Telephone number:	
	[Illegible]

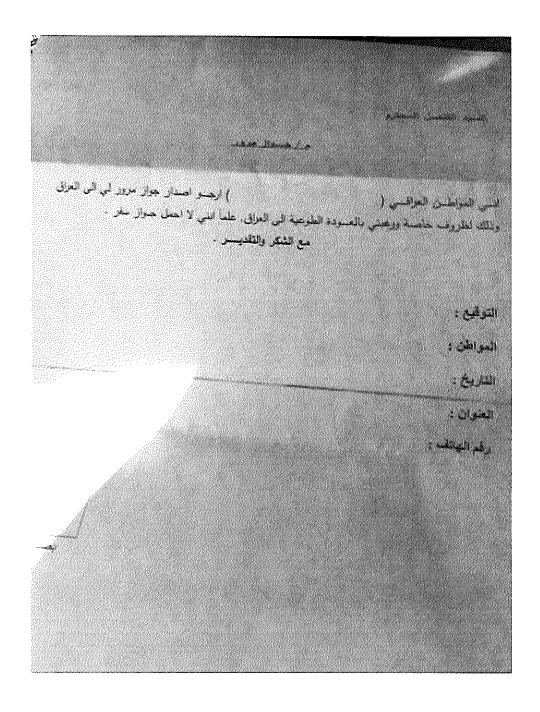


EXHIBIT B

Dear Honorable Consul,
Subject: Passport
I the Iraqi citizen () would like to request the issue of a passport allowing me to enter Iraq due to my particular situation and my desire to return voluntarily to Iraq. I would like to inform you that I have an old Iraqi passport that is not valid with the number ().
With thanks and appreciation,
The signature: The name:
The date:
The address:
The telephone number:
Left thumb fingerprint

4/ स्था लि

مع الشكر والتقديب
وذلك لظروف خاصمة ورغبتي بالعسودة الطوعية الي العراق, علماً انني لا احمل جواز سفر .
أبي المواطن العراقي () ارجو اصدار جواز مرور لي الي العراق

ويعوالا	:	

المواطن:

: زئي لتاا

: نا منعا

: مقتلها عق

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EXHIBIT C

Case 2:17-cv-11910-MAG-DRG ECF No. 457-63 filed 10/23/18 PageID.11949 Page 18 HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,	
Subject/ Limited-Validity Passport	
I, an Iraqi citizen (), would like to request a limited-validity patravel] to Iraq and this is for personal circumstances and my desire to return validity patravel to Iraq and this is for personal circumstances and my desire to return validity patravel.	
[No salutations]	
Signature: Name: Date: 21/3/2016 Address: Telephone number:	Left thumb fingerprint
	[fingerprint]

السيد القنصل المحترم

م/حسواز مرور

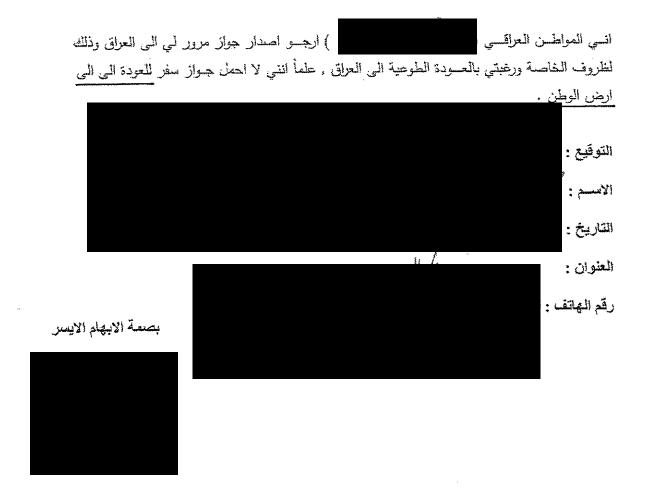


EXHIBIT D

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,		
	Subject/ Limited-Validity Passport	
), would like to request a limited-validity property and circumstances and my desire to return sport to return to to [sic] the homeland.	
[No salutations]		
Signature:		
Name:		
Date: 20/6/2016		
Address:		
Telephone number:		
		Left thumb fingerprint
		[fingerprint]

السيد القنصل المحترم

م / جـواز مروز

انبي المواطن العراقبي العواقب) ارجو اصدار جواز مرور لي الى العراق وذلك لطروف الخاصة ورغبتي بالعودة الطوعية الى العراق , علماً أنني لا احمل جواز سفر العودة الى الى ارض الوطن .



EXHIBIT E

Case 2:17-cv-11910-MAG-DRG ECF No. 457-63 filed 10/23/18 PageID.11955 Page 24 of 43 HIGHLY CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,		
	Subject/ Limited-Validity Passport	
), would like to request a limited-validity past onal circumstances and my desire to return vossport to return to to [sic] the homeland.	
[No salutations]		
Signature:		
Name:		
Date:12/30/2016		
Address:		
Telephone number:		
		Left thumb fingerprint

السيد القنصل المحترم

م المسور عرور

انسي المواطن العراقبي المعرفة الموعية الى العراق , علماً اتني لا احمل جواز سفر المعودة الى العراق وذلك الض الوطن .

ريخ : 2016 وان :		التوقيع:
وان: الهاتف:		* parametrick
المنها تقد :		التاريخ: 2016
النهاتف : يصمة الايهام الايم		العنوان:
يصمه الايهام الايم		يقم النهاتق :
	يصمه الابهام الايم	

	1	

EXHIBIT F

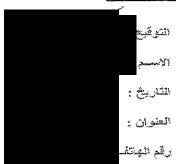
Case 2:17-cv-11910-MAG-DRG ECF No. 457-63 filed 10/23/18 PageID.11958 Page 27 HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,	
	Subject/ Limited-Validity Passport
I, an Iraqi citizen (travel] to Iraq and this is for person knowledge that I don't hold a pass), would like to request a limited-validity passport issued to me [to nal circumstances and my desire to return voluntarily to Iraq, with the port to return to to [sic] the homeland.
[No salutations]	
Signature:	
Name:	
Date: [illegible handwritten date]/	2016
Address:	
Telephone number:	
	Left thumb fingerprint
	<u> </u>

السيد القنصل المحترم

14 24 310-2 / 2

انسي المواطنين المعراقسيي والمعين أسميل المعرفية البيان المجلس المسدار جوائز مرور لمي الني العراق وثلثك تمظروف المناصة ورغمتني بالعسودة العلوجية المي العراق ، علماً اتني لا احمل جبواز سفر المعودة المي المي ارض الوطن .



بشممة الايبهام الايبسر

EXHIBIT G

Case 2:17-cv-11910-MAG-DRG ECF No. 457-63 filed 10/23/18 PageID.11961 Page 30 of 43

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Subject/ Limited-Validity Passport I, an Iraqi citizen (), would like to request a limited-validity passport issued to me travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, wit knowledge that I don't hold a passport to return to to [sic] the homeland.	
travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, wit	
	to I the
[No salutations]	
Signature:	
Name:	
Date://2016	
Address:	
Telephone number:	
Left thumb fingerprin	

Subject Refused

السيد القتصل المحترم

م/حواز مرور

انبي المواطن العراقي () أرجسو اصدار جواز مرور لي الي العراق وذلك لظروف الخاصة ورغبتي بالعبودة الطوعية الى العراق , علماً انني لا احمل جواز سفر للعودة الى الى الرض الوطن .

التوقيع :

الإسسم:

التاريخ: / /2016

العتوان:

رقم الهاتف:

	الايسر	الايهام	åa
1			

EXHIBIT H

Case 2:17-cv-11910-MAG-DRG ECF No. 457-63 filed 10/23/18 PageID.11964 Page 33 HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,					
	Subject/ Limited-Validity Passport				
I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport to return to to [sic] the homeland.					
[No salutations]					
Signature:					
Name:					
Date://2016					
Address:					
Telephone number:					
		Left thumb fingerprint			

Subject Reford

السيد القتصل المحترم

م/جسوان مرور

انسي المواطن العراقسي () الرجدو اصدار جواز مرور لي الى العراق وذلك لظروف الخاصة ورغبتي بالعدودة الطوعية الى العراق , علماً انني لا احمل جواز سفر للعودة الى الى الرض الوطن .

التوقيع :

الاسسم:

التاريخ: / /2016

العنوان:

رقم الهاتف:

بصمة الابهام الايسر

EXHIBIT I

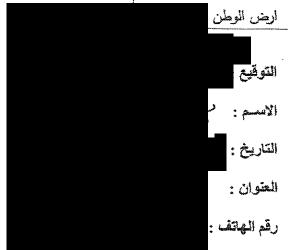
Case 2:17-cv-11910-MAG-DRG ECF No. 457-63 filed 10/23/18 PageID.11967 Page 36 HIGHLY CONFIDENTIAL – SOBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,					
	Subject/ Limited-Validity Passport				
I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport to return to to [sic] the homeland.					
[No salutations]					
Signature:					
Name:					
Date: 5/4/2016 [handwritten 7]					
Address:					
Telephone number:					
		Left thumb fingerprint			
	Francisco	[fingerprint]			

السيد القنصل المحترم

م/حواز مرور

انسي المواطن العراقسي المعرفية الم العراق وذلك المعرف المعرف المعرف المعرف المعرف المعرفة المعرف المعرفة المع



يصمة الابهام الايسر



EXHIBIT J

Case 2:17-cv-11910-MAG-DRG ECF No. 457-63 filed 10/23/18 PageID.11970 Page 39 HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

Dear Honorable Consul,					
	Subject/ Limited-Validity Passport				
I, an Iraqi citizen (), would like to request a limited-validity passport issued to me [to travel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the knowledge that I don't hold a passport to return to to [sic] the homeland.					
[No salutations]					
Signature:					
Name:					
Date:// 2016 -[handwritten 06-8-2017]					
Address:					
Telephone number:					
		Left thumb fingerprint			
		[fingerprint]			
	·	[fingerprint]			

السيد القتصل المحترم

م/حواز مرور

انسي المواطن العراقسي () الرجد اصدار جواز مرور لي الى العراق وذلك الطروف الخاصة ورغبتي بالعدودة الطوعية الى العراق علماً انني لا احمل جواز سفر العودة الى الى الرض الوطن .



يصمة الايهام الايس



EXHIBIT K

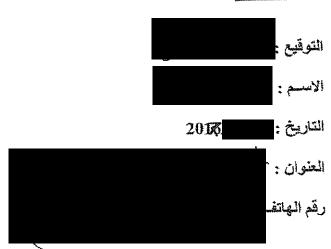
Case 2:17-cv-11910-MAG-DRG ECF No. 457-63 filed 10/23/18 PageID.11973 Page 42 HIGHLY CONFIDENTIAL – SOLUTION TO PROTECTIVE ORDER

Dear Honorable Consul,		
	Subject/ Limited-Validity Passport	
an Iraqi citizen (), would like to request a limited-validity passport issued to me [to ravel] to Iraq and this is for personal circumstances and my desire to return voluntarily to Iraq, with the nowledge that I don't hold a passport to return to to [sic] the homeland.		
[No salutations]		
Signature:		
Name:		
Date: 04/11/201 6 [handwritten 7]		
Address:		
Telephone number:		
		Left thumb fingerprint
		[fingerprint]

السيد القنصل المحترم

م/جواز مرور

انسي المواطن العراقسي العراقسي) ارجو اصدار جواز مرور لي الى العراق وذلك لظروف الخاصة ورغبتي بالعودة الطوعية الى العراق ، علماً انني لا احمل جواز سفر اللعودة الى الى ارض الوطن .



يصمة الإيهام الأيسر